

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF ARKANSAS
WESTERN DIVISION**

ROSIE M. COLLIER

PLAINTIFF

V.

NO. 4-05-CV-1624 GTE

CITY OF LITTLE ROCK, *et al.*

DEFENDANTS

AGREED PROTECTIVE ORDER

Upon agreement of Plaintiff and Defendants, the Court hereby enters the following Agreed Protective Order in the referenced case:

1. The parties have agreed that, in their initial disclosures and during the course of discovery in this case, files containing personnel records, job evaluation and performance records, and other records maintained in the ordinary course of business of the City of Little Rock ("City") pertaining to Plaintiff and other City employees will be produced for us in litigating this case. Portions of the materials contained in these files are regarded as confidential such as social security numbers and home addresses of third parties. It is likely that Plaintiff and defense counsel may wish to use these files, including the confidential materials, during depositions of the witnesses and for other purposes in connection with the litigation. If confidential documents or records are used during depositions, the depositions shall be treated as confidential in accordance with this Order. The parties further agree that social security numbers of third parties shall be redacted from any records produced.

2. Plaintiff and Defendants agree that all such files described in paragraph 1 of this Order shall be treated as confidential by the parties and their counsel, that the information contained therein shall be used solely for the purpose of litigating this action and that neither the files nor the information contained therein shall be disclosed except as permitted by this Order. The parties agree that any such files produced during this action and any information contained therein may be disclosed only to the attorneys of record for the parties, their assistant(s) or any

expert witnesses retained by the parties in connection with this action and shall not be disclosed to any other person, partnership, firm, corporation or any other person or entity.

3. Any document, information or deposition designed as confidential under this Order shall, when filed with the Court, be clearly marked "confidential", sealed by the Court and placed in separate, secure storage to be opened by authorized Court personnel only. Upon final termination of this action, including all appeals, Plaintiff shall return all confidential material in her possession and all copies made by her or at her direction to counsel for the Defendants.

4. Nothing contained in this Agreed Protective Order, nor any action taken in compliance with it, shall operate as an admission by any party that any particular matter is or is not confidential within the contemplation of law, or prejudice in any way the right of any party to seek a determination of whether or not any particular material need be disclosed or, if disclosed, whether or not it shall be subject to the terms of this Agreed Protective Order.

IT IS SO ORDERED THIS 10th DAY OF July, 2006.

 /s/ Garnett Thomas Eisele
G. THOMAS EISELE
UNITED STATES DISTRICT JUDGE

APPROVED:

 /s/ Rosie Collier
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Pro Se Plaintiff

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